

FILED

MAR - 5 2014

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
v.)
Plaintiff,)
DEMETRIUS NEAL,)
Defendant.) No.

4:14CR00069 AGF/NAB

INDICTMENT

COUNT ONE

The Grand Jury charges that:

Introduction

1. Between November 15, 2013 and January 14, 2014 ("the relevant time period"), the Defendant was employed as a manager of a CVS pharmacy and store located in Maplewood, Missouri which lies within the Eastern District of Missouri (the "store").
2. During the relevant time period, the Defendant developed a scheme to defraud his employer of money by making unauthorized and fraudulent returns on the store's cash registers. Some of the returns were issued in cash and some were directed to a credit card account number Defendant controlled.
3. It was a part of the scheme that Defendant entered false codes and values into the store cash register to generate these fraudulent returns. In truth, no merchandise was returned to the store.
4. By entering false codes and values into the store cash register and directing credits to credit card accounts and bank accounts, including a Visa account and a linked Bank of

America checking account, the Defendant caused electronic signs, wires and signals to be sent in interstate commerce within the CVS computer network and to the computer networks used by Visa and Bank of America.

5. In all, during the relevant time period, the Defendant directed in excess of \$30,000 in cash and credit card account credits to himself and credit card accounts and bank accounts he controlled.

Offense Conduct

6. Between on or about November 15, 2013 and January 14, 2014, in the Eastern District of Missouri and elsewhere, defendant,

DEMETRIUS NEAL,

knowingly and with intent to defraud used counterfeit access devices as defined in subsection (e)(2) to wit: false codes and values associated with thirty-eight fraudulent returns to the store, said use affecting interstate and foreign commerce, in violation of 18 U.S.C. § 1029(a)(1).

A TRUE BILL.

FOREPERSON

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